



potential
EPA expressed env. concerns with impacts of proposed harvest activities within riparian reserves.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

July 29, 1997

970120

EC-2

Reply To
Attn Of: ECO-088

Ref: 96-041-AFS

Don Ostby
Forest Supervisor
Umpqua National Forest
P.O. Box 1008
Roseburg, Oregon 97470

Dear Mr. Ostby:

We have reviewed the draft Environmental Impact Statement (EIS) prepared for the proposed **Little River DEMO Timber Sale** in accordance with our responsibilities under the National Environmental Policy Act and §309 of the Clean Air Act. The draft EIS analyzes alternatives to harvest timber in the Upper Emile and Upper Little River watersheds or the Plusfour and Cultus watersheds from 160 acres on the North Umpqua Ranger District. The proposed project is intended to meet the criteria of the Demonstration of Ecosystem Management Options (DEMO) Study Plan.

We have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information), mainly due to proposed harvest activities within riparian reserves. This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system used in our review is enclosed for your reference.

The Standards and Guidelines (S&Gs) of Northwest Forest Plan (NWFP) Record of Decision (page C-1) state that there is a recognized hierarchy among S&G's when apparent conflicts among S&Gs arise (research and riparian in this particular case). The priority of riparian S&Gs is second only to those associated with congressionally reserved areas and the riparian S&Gs are intended to be overlaid on all land allocations, including Adaptive Management Areas (AMAs). Activities within AMAs must be assessed to determine if they are consistent with the objectives of the S&Gs. The Umpqua Forest has made some effort to minimize the potential effects of the proposed riparian harvest, however, we note with concern that the Little River is currently listed as water quality limited for temperature, flow and habitat modification, and sedimentation. We believe that any riparian buffer that can be left in place in this system will speed the system's overall recovery from its present degraded aquatic condition.

The Little River Watershed Analysis also recommends that current management actions maintain or improve riparian functions so as to be consistent with Aquatic Conservation Strategy (ACS) objectives. Even though the proposed riparian reserve harvest is located above the perennial segment of the Upper Little River, management activities in these upper intermittent streams, including head wall areas, can stress perennial downstream functions. While we trust the judgement of your staff and the interagency consultation team in their *de-minimis* determination, we are still compelled to express our concerns regarding riparian harvest.

We have already identified our concerns with this project in phone conversations between you and your staff and Michael Rylko of my staff. Given the research nature of the proposed actions, we would appreciate receiving any resultant water quality monitoring information, in particular that which either corroborates or refutes Forest Service assumptions regarding maintenance of water quality and achievement of ACS objectives both in and downstream of the proposed management area.

Thank you for the opportunity to review this draft EIS. Should you have any questions, please contact Michael Rylko at (206) 553-4014.

Sincerely,

A handwritten signature in cursive script that reads "Richard B. Parkin".

Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosure

cc: Craig Tuss - USFWS, Roseburg
Frank Bird - NMFS, Roseburg

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.